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SAMSUNG SDI AMERICA, INC.,
10 SAMSUNG SDI (MALAYSIA) SDN. BHD.,
SAMSUNG SDI MEXICO S.A. DE C.V.,
11 SAMSUNG SDI BRASIL LTDA.,
SHENZHEN SAMSUNG SDI CO., LTD. and
12 TIANJIN SAMSUNG SDI CO., LTD.

13 UNITED STATES DISTRICT COURT
14 NORTHERN DISTRICT OF CALIFORNIA
15 SAN FRANCISCO DIVISION
16

17 IN RE: CATHODE RAY TUBE (CRT)
18 ANTITRUST LITIGATION

Case No. 07-5944 SC

MDL No. 1917

19 This Document Relates to:

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21 *All Indirect Purchaser Actions*

22 *Sharp Electronics Corp., et al. v. Hitachi Ltd.,*
23 *et al.*, No. 13-cv-1173;

24 *Sharp Elecs. Corp. v. Koninklijke Philips*
25 *Elecs. N.V.*, No. 13-cv-02776;

26 *Siegel v. Hitachi, Ltd.*, No. 11-cv-05502;

27 *Siegel v. Technicolor SA, et al.*, No. 13-cv-
28 05261;

**DECLARATION OF JAMES L.
MCGINNIS IN SUPPORT OF SDI
DEFENDANTS' MOTION *IN LIMINE* TO
EXCLUDE IRRELEVANT AND
PREJUDICIAL PORTIONS OF
PLAINTIFFS' TRIAL EXHIBIT, BATES
STAMPED TSA-CRT00077732 [SDI'S MIL
NO. 2]**

1 *Best Buy Co., et al. v. Hitachi, Ltd., et al.*,
2 No. 11-cv-05513;

3 *Best Buy Co., et al. v. Technicolor SA, et al.*,
4 No. 13-cv-05264;

5 *Target Corp. v. Chunghwa Picture Tubes,*
6 *Ltd., et al.*, No. 11-cv-05514;

7 *Target Corp. v. Technicolor SA, et al.*, No. 13-
8 cv-05686;

9 *Sears, Roebuck and Co. and Kmart Corp. v.*
10 *Chunghwa Picture Tubes, Ltd.*, No. 11-cv-
11 05514;

12 *Sears, Roebuck and Co. and Kmart Corp. v.*
13 *Technicolor SA*, No. 13-cv-05262;

14 *Viewsonic Corp. v. Chunghwa Picture Tubes,*
15 *Ltd.* No. 14-cv-02510.

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REDACTED VERSION; EXHIBITS SUBMITTED UNDER SEAL

1 I, James L. McGinnis, declare as follows:

2 1. I am a partner at the law firm of Sheppard Mullin Richter & Hampton LLP, counsel
3 of record for defendants Defendants Samsung SDI America, Inc.; Samsung SDI Co., Ltd.;
4 Samsung SDI (Malaysia) SDN. Bhd.; Samsung SDI Mexico S.A. De C.V.; Samsung SDI Brasil
5 Ltda.; Shenzhen Samsung SDI Co., Ltd.; and Tianjin Samsung SDI Co., Ltd. (collectively, "SDI").
6 I submit this declaration in support of SDI Defendants' Motion *In Limine* To Exclude Irrelevant
7 And Highly Prejudicial Portions of Plaintiffs' Trial Exhibit, Bates Stamped TSA-CRT00077732
8 ("SDI's MIL No. 2"). I have personal knowledge of the facts herein set forth and, if called as a
9 witness, I could and would competently testify thereto.

10 2. Attached hereto as Exhibit 1 is a true and correct copy of Plaintiffs' certified
11 translation of TSA-CRT00077732, with irrelevant and highly prejudicial portions which SDI
12 proposes redacting indicated in yellow highlight.

13 3. Attached hereto as Exhibit 2 is a true and correct copy of excerpts of the January 9,
14 2015 deposition of Meggan Ehret, Thomson Consumer Electronics, Inc.'s 30(b)(6) designee.

15
16 I declare under penalty of perjury under the laws of the United States of America
17 that the foregoing is true and correct.

18 Executed this 13th day of February 2015 in San Francisco, California.

19
20 /s/ James L. McGinnis

21 James L. McGinnis
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EXHIBIT 1

[SUBMITTED UNDER SEAL]

EXHIBIT 2

[SUBMITTED UNDER SEAL]